



September 3, 2014

Natural Resources Board  
Districts 2 Environmental Commission  
100 Mineral Street, Suite 305  
Springfield, VT 05156-3168  
Attn: April Hensel, District 2 Environmental Coordinator

RE: Act 250 Application #2W1318 (Denison Lumber Co., Inc. / Ashfield Stone – Halifax)

Dear Ms. Hensel,

Please accept this letter as the Windham Regional Commission's (WRC) initial response to the above application. In review of this application, the WRC Project Review Committee has several concerns we would like the District Environmental Commission to be aware of. We intend to participate in the hearing and may have additional comments.

The proposed quarry lies in what the Windham Regional Plan Proposed Land Use Map identifies as Resource Lands. Protection of this area is a policy articulated in the Windham Regional Plan.

*6.10 Natural Resource Policies*

*Forest Resources*

*2. Discourage the fragmentation of large parcels of forestland for development or conversion to non-forest uses.*

Furthermore, the Windham Regional Plan addresses a multitude of potential impacts related to mineral resource extraction.

*6.10 Natural Resource Policies*

*Mineral Resources*

*2. Extraction of mineral resources shall not interfere with or have negative impacts on groundwater, air quality (dust and noise), and special community resources (historic sites, recreation areas, or scenic areas). Extraction sites must handle truck traffic without creating unsafe conditions for adjoining landowners.*

The proposed site is in close proximity to important habitat areas, such as Deer Park Pond and numerous wetlands and tributaries to Pond Brook. The proposed quarry area is 130 feet, and the

access roadway is 220 feet, from bear wetland feeding habitat. The entire area is bear production habitat, and the proposed project would disturb 1.72 acres of deer wintering area.

#### *6.10 Natural Resource Policies*

##### *Natural Areas, Fragile Areas and Wildlife Resources*

*2. Protect important ecosystems and maintain or enhance the habitat needs and travel corridors required by the region's larger mammals.*

The noise generated by the proposed quarrying activity could disrupt wildlife use of valuable habitat. We have a concern about noise because the application mentions that a saw will be used on the site to saw apart large pieces of stone, yet this saw is not mentioned in the Noise Impact Assessment.

There is concern about impacts to surface waters, both from point and non-point (stormwater) sources. The proposed access road will require several stream crossings. The project will impact a total of 1,202 square feet of intermittent, ephemeral and perennial streams and .67 acres of stream buffer. Additionally, the application proposes using a 6' diameter by 60' long culvert, which could cause significant impact to habitat and the hydrologic balance of the area. These impacts might be contrary to several Regional Plan policies.

#### *6.10 Natural Resource Policies*

##### *Surface Waters*

*1. Maintain undisturbed buffers of vegetation along watercourses, lakes, ponds, wetlands, and vernal pools in order to protect shorelines, provide shading to prevent undue increase in stream temperatures, minimize effects of erosion, sedimentation and other sources of pollution, and maintain scenic, recreational, and habitat values.*

*2. Maintain or enhance existing chemical, physical, and biological quality of the region's surface waters.*

*8. Maintain water flows in streams at levels that support a full range of in-stream uses and values.*

One of the major impacts of quarries is their long term impact on the landscape. The applicant proposes for reclamation surety an escrow of \$1,000 per year until the fund reaches \$10,000. For reclamation of a quarry of this scale, this is most likely not adequate. We would also note that while the application refers to a reclamation plan, as being shown on sheet C-8, that sheet does not provide a reclamation plan. The applicant should provide a reclamation plan. Without such a plan included it is difficult to assess what a proper reclamation amount should be.

#### *6.10 Natural Resource Policies*

##### *Mineral Resources*

3. *Ensure that effective site rehabilitation plans are provided and implemented.*

We note that the WRC has communicated with the affected town of Halifax and that we endorse their concerns about issues such as potential impacts to transportation infrastructure and surrounding residences. That being said, this letter addresses the issues that our Project Review Committee has deemed are of regional concern.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Alyssa Sabetto', written in dark ink.

Alyssa Sabetto  
Planner

## **E-Notification CERTIFICATE OF SERVICE #2W1318**

I hereby certify that I sent a copy of the foregoing Notice of Hearing on July 23, 2014, by U.S. Mail, postage prepaid, to the individuals without email addresses and by electronic mail, to the following with email addresses: **Note: Any recipient may change its preferred method of receiving notices and other documents by contacting the District Office staff at the mailing address or email below. If you have elected to receive notices and other documents by email, it is your responsibility to notify our office of any email address changes.** All email replies should be sent to [nrb-act250springfield@state.vt.us](mailto:nrb-act250springfield@state.vt.us)

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